IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA

NEW ALBANY DIVISION

IN THE MATTER OF:

CASE NO. 17-90535-BHL-13

Marco Kurt Prescher Debtor

CHAPTER 13

OBJECTION TO CONFIRMATION OF PLAN

Comes now OneMain Financial of Indiana, Inc. as servicer for Springleaf Funding Trust 2015-B fka Springleaf Financial Services of Indiana, Inc., and objects to the confirmation of this plan and in support thereof says:

- 1. On August 5, 2016, Debtor gave Creditor a secured interest in a 07 Keystone Outback, 4YDT30R227S630610.
- 2. The Debtor values the 07 Keystone Outback, 4YDT30R227S630610 at \$4,000.00. The creditor wishes to be paid their Proof of Claim amount of \$11,736.25. The current prime rate is 4%. Creditor would not object to 6% interest rate.
- 3. A copy of N.A.D.A Official Used Car Guide Automated Vehicle Valuation for the 07 Keystone Outback, 4YDT30R227S630610 is attached valuing the 07 Keystone Outback, 4YDT30R227S630610 at \$35,207.00 hereto as Exhibit "A".
- 4. Creditor is entitled to a consistent monthly payment. For Creditor's claim to properly liquidate creditor would have to receive \$230.19 per month over the life of the plan of 59 months.
- 5. Creditor should receive equal, pre-confirmation adequate protection payments of no less than 117.37 per month.

- 6. Creditor is unaware if the secured property is insured and not aware of the insurance company and policy number.
 - 7. A copy of the Note is attached hereto as Exhibit "B".
 - 8. The vehicle title is attached hereto as Exhibit "C".

WHEREFORE, Creditor prays this plan not be confirmed and for all other just and proper relief.

May 22, 2017

KRISOR & ASSOCIATES

By: /s/Brooks J. Grainger Brooks J. Grainger (19362-71) Attorney for Plaintiff PO Box 6200 South Bend, IN 46660 Ph: (574) 272-1000

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Marco Kurt Prescher, 1446 S. Pine Hill Road, Lexington, IN 47138, by first class mail, and upon Lloyd Koehler, 400 Pearl Street, Suite 200, New Albany, IN, 47150, Joseph M. Black, P.O. Box 846, Seymour, IN, 47274, and U.S. Trustee, 101 W. Ohio St, Ste 1000, Indianapolis, IN 46204, via electronic mail, on May 22, 2017

/s/Brooks J. Grainger Brooks J. Grainger